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January 28, 2015

**VIA ECF**

The Honorable Jesse M. Furman, U.S.D.J.  
United States District Court, Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: Ojeda v. Viacom, Inc., Docket No.: 13-CV-5658 (JMF)

Dear Judge Furman:

This firm is legal counsel to Plaintiffs and a collective class in the above-referenced wage and hour action. I write on behalf of counsel for all parties to respectfully request an adjournment of the February 3, 2015 pre-trial conference *sine die* so as to allow Magistrate Judge Gorenstein to oversee the settlement process through completion of this action.

As noted in my December 31, 2014 letter to you, the parties have already reached an agreement in principle with respect to the most essential terms of settlement. Moreover, pursuant to your January 12, 2015 Orders [Dkt 89 and Dkt 90], this matter has been referred to Judge Gorenstein for settlement.

The parties have corresponded with Judge Gorenstein, and he has ordered us appear for a settlement conference on March 13, 2015 [Dkt 93]. Moreover, the parties have already exchanged a term sheet, in addition to initial drafts of the settlement agreement and release, proposed notice and claim form, and the proposed publication order.

This is our first request to adjourn the February 3, 2015 pre-trial conference.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Lloyd Ambinder

cc: Lyle S. Zuckerman (via ECF)  
Jeffrey K. Brown, Esq. (via ECF)